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Colorado Department of Public Health and Environment

LTR ENC http://www.cdphe.state.co.us

October 20, 2003

Mr. Joe Legare

Acting Assistant Manager for Environment and Stewardship U.S. Department of Energy, Rocky Flats Field Office 10808 Highway 93, Unit A Golden, CO 80403-8200

RE: No Further Accelerated Action (NFAA) for IHSS Groups 150.6 and 150.8 (B779) - Approval

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the NFAA Justification for IHSS Groups 150.6 and 150.8, dated October 16, 2003. The IHSS Groups 150.6 and 150.8 are associated with radiological surface releases that were previously indicated to have been remediated to the south and northeast of B779. Based on the information provided, the Division is hereby approving this request for No Further Accelerated Action.

Although we are approving NFAA for these IHSSs, we have the following comments:

1. Why are Figures 6 "Area of Landslides and High Erosion Potential", and Figure 7 "Composite VOC Groundwater Plume" provided, since they are not referenced in this document?

2. Figure 6 does not properly portray all of the areas with landslide or high erosion potential, and should at least be modified to include the area south and west of B991 before being utilized again.

3. The section discussing the "Application of the Subsurface Soil Risk Screen" does not properly discuss the issues nor provide the specific information to confirm the determination made. Simply because this was identified as a surface contamination issue, it can not be concluded that "subsurface soil contamination would not have occurred from this incident." There should also have been a discussion of the contamination found in the surface samples in relation to the contamination found in the groundwater wells and/or plumes (Figure 7) in this area. However, all of this should be properly addressed in the IHSS Group 700-7 investigation, which will include all of the possible contamination identified as well as possible subsurface radionuclide concerns.

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If you have any questions regarding this correspondence please contact me at (303) 692-3367, David Kruchek at (303) 692-3328, or Elizabeth Pottorff at (303) 692-3429.

Reviewed for Addressee Corres. Control RFP Sincerely,

10/28/03 XC

Steven H. Gunderson RFCA Project Coordinator

Ref. Ltr. #

cc: Norma Castaneda, DOE

Lane Butler, KH Dave Shelton, KH

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